

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1
THOMPSON HINE LLP**

3900 Key Center, 127 Public Square

Cleveland, OH 41144-1291

(216) 566-5936

(216) 566-5800 – facsimile

Jeremy M. Campana (031852000) (Jeremy.Campana@ThompsonHine.com)

Jonathan S. Hawkins (*pro hac vice*) (Jonathan.Hawkins@ThompsonHine.com)

Attorneys for Creditor Global Merchant Cash, Inc.

In re:

ORBIT ENERGY & POWER, LLC,

Debtor.

Chapter 7

Case No.: 22-19628-ABA

Judge Andrew B. Altenburg Jr.

**Hearing Date and Time:
August 5, 2025 at 10:00 a.m.**

**Objection Deadline:
July 31, 2025**

**NOTICE OF THOMPSON HINE LLP'S MOTION TO WITHDRAW
AS ATTORNEYS FOR CREDITOR GLOBAL MERCHANT CASH, INC.**

PLEASE TAKE NOTICE that Thompson Hine LLP ("Thompson Hine") and its attorneys, Jeremy M. Campana ("Mr. Campana") and Jonathan S. Hawkins ("Mr. Hawkins," and together with Thompson Hine and Mr. Campana, "Movants"), pursuant to D.N.J. LBR 9010-2(b), shall move before the Honorable Andrew B. Altenburg Jr., United States Bankruptcy Judge, on August 5, 2025, at 10 a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, NJ 08101, Courtroom 4B, by motion (the "Motion") for entry of an order in the form attached to the Motion (the "Proposed Order") authorizing withdrawal from representation of Global Merchant Cash, Inc. ("GMC"), a creditor in the above-captioned bankruptcy proceeding.

PLEASE TAKE FURTHER NOTICE that Movants shall rely upon the Certification submitted herewith. Because no novel, unique, or complicated issues of law are presented, no brief has been filed pursuant to D.N.J. LBR 9013-1(a)(3).

PLEASE TAKE FURTHER NOTICE that any papers in opposition to the Motion must be filed with the Court and served upon Movants no later than 7 days in advance of the hearing date pursuant to D.N.J. LBR 9013-2(a)(2). If no opposing papers are filed and served within the required time, the Motion shall be decided on the papers pursuant to D.N.J. LBR 9013-3(d) and an Order granting Movants permission to withdraw as counsel for GMC may be signed and entered in the Court's discretion.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(d) oral argument may only be presented by a party that has filed an opposition to the Motion.

Dated: July 15, 2025

Respectfully submitted,

/s/ Jeremy M. Campana
Jeremy M. Campana (031852000)
Jonathan S. Hawkins (admitted *pro hac vice*)
THOMPSON HINE LLP
3900 Key Center, 127 Public Square
Cleveland, OH 44114
T: 216.566.5936/F: 216.566.5800
Jeremy.Campana@ThompsonHine.com
Jonathan.Hawkins@ThompsonHine.com

Counsel for Global Merchant Cash, Inc

CERTIFICATE OF SERVICE

The undersigned affirms that the foregoing was filed with the Bankruptcy Court on July 15, 2025 and served on all parties registered to receive notice via the Court's electronic noticing system and on the Trustee, United States Trustee and Global Merchant Cash, Inc. via U.S. mail at the following addresses:

Andrew Sklar, Esq.
Sklar Law, LLC
20 Brace Road, Suite 205
Cherry Hill, NJ 08034

Attorneys for Trustee Andrew Sklar

Asst. U.S. Trustee
Kevin Callahan, Esq.
US Department of Justice
Office of the U.S. Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

Jay Keller
Tara Cates
Joel Brebbia
Global Merchant Cash, Inc.
64 Beaver Street, Suite 415
New York, NY 10004

/s/ Jeremy M. Campana
Jeremy M. Campana, Esq.